

Appl. No. 10/608,885  
Response Dated April 26, 2005  
Reply to Office Action of January 26, 2005

### REMARKS/ARGUMENTS

In the Action mailed January 26, 2005, claims 1-73 were finally rejected under 35 U.S.C. 102(b) as being anticipated by Lavery et al, U.S. Patent 6,362,895, ("Lavery"). In this Amendment, claims 1, 9, 13 and 63 have been amended. As discussed below, it is believed that Lavery does not anticipate the methods in the presently submitted claims. A Request for Continued Examination is submitted herewith.

Pending claims 1-73 are directed to methods for creating an electronic product design at a user computer using tools that execute in the browser of the user computer and allow the user to incorporate content into a design template at the user computer while the user is viewing the template.

By contrast, Lavery (col. 9, line 47 to col. 10, line 17) discloses a document creation system where the user enters text data into a pre-configured order form (col. 9, lines 62-65) for transmission to a web site where the information from the form is combined with other information stored at the web site to create a product design. The completed design created at the web server is returned to the user as a PDF file for review. The PDF file is not directly editable by the user at the user's computer. If a Lavery user desires to modify the product design, the user must again view the order form, modify the data in the form, and resubmit the data to the web site for the generation of another PDF (col. 10, line 13-17).

Applicants disagree with the Examiner's interpretation that modules 409 and 411 disclose product design tools adapted to execute in the browser of the user computer. At col. 9, lines 54-56 Lavery states that module 409 is used internally by product specialists, giving no suggestion that such a module might be provided to the

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user computer for execution. Further, the On-line Printing Center Module shown in Fig. 4, and labeled as 411, has no function at all. No system or process by that name appears anywhere in Lavery and the reference number 411 was apparently attached to it by mistake. The reference number 411 appears twice in Fig. 4 and is actually used by Lavery (see col. 11, line 51) to refer to the communication link between ILLAD 410, Batch Service 426 and Plater Service 428. Step 1212, as described at col. 21, lines 15-17, only relates to accessing and viewing of the PDF preview file. The ability to view PDF files is a standard function of modern browser programs and does not require or suggest the downloading of any product design tools adapted to execute in the browser.

Applicants also see no disclosure in Figs. 6, 8 or 9 or elsewhere in Lavery teaching the use of providing a plurality of template images for viewing by the user of the user computer. While the customer in Lavery must admittedly have some way of selecting a particular product the customer desires to order, Lavery is totally silent on how this might be accomplished. It could be done by simply showing the user a text listing of available documents from which the user could select a desired product. Nothing in Lavery suggests that presenting template images to the user might be employed.

Referring specifically to claim 1, nothing in Lavery teaches or suggests displaying a product design that is "a partially completed electronic product design", or "allowing the user to provide content for incorporation by the tools at the user computer into the selected product design template" or "displaying the electronic product design to the user while the user is providing content".

Referring to independent claim 9, Lavery similarly does not teach displaying "one or more product template images to the user of the user computer, each product template image being a partially completed electronic design" or executing design

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tools in the browser "while the user is viewing the product design template" to create an electronic product design.

Also similarly, referring to independent claim 13, Lavery does not teach tools adapted to "execute in the browser of the user computer, display one or more product template images to the user, display a product template corresponding to a product template image selected by the user, the product template being a partially completed electronic product design" and "incorporate user content into the selected product template while the user is viewing the product design template to create an electronic design at the user computer".

For similar reasons as discussed above, claims 2-8, 11-12 and 14-73 are likewise not suggested or disclosed by Lavery.

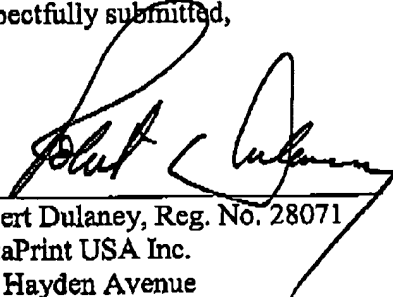
In the Action of January 26, 2005, the Examiner supplied specific comments applying Lavery against only claims 1-9 and 16-30, indicating that all other claims are covered by the limitations of these claims. Applicants believe that many of the other claims include limitations not included in claims 1-9 or 16-30. For example, dependent claims 35-45 and 51-61 relate to methods wherein the user creates the design with the support of a design assistant. Claims 1-9 or 16-30 do not include this feature. Dependent claims 70-73 relate to methods wherein a design template is created for the user based on user information and then made available to the user for use in creating an electronic product design. Claims 1-9 or 16-30 do not include this feature.

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In light of the above remarks and amendments, it is respectfully submitted that claims 1-73 are patentable and now in condition for allowance. Favorable action and allowance of the pending claims is respectfully requested.

A Request for Continued Examination and the associated fee are submitted herewith. If any additional fee is required by this Amendment, the fee may be charged to Deposit Account 502765.

Respectfully submitted,



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